

# **Exhibit 2**

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**From:** Matthew T. Wise  
**Sent:** Wednesday, January 23, 2019 3:58 PM  
**To:** JGrunert@Campbell-trial-lawyers.com  
**Cc:** Gregory M. Meihn; Carolyn B. Osborn; Shannon K. Breznai; Joseph Galvin; 'kkilby@mcgrawmorris.com'  
**Subject:** Flint Water - KWA Subpoena  
**Categories:** Important, Flint Water Cases

Mr. Grunert:

I write regarding a subpoena which your office (and two others) recently issued to the Karegnondi Water Authority (KWA). My office has been retained to handle the response to this subpoena and we would like to discuss this with you.

I want to make clear that, without waiving any objections, we would like to approach this from a cooperative manner in which we can figure out exactly what you all are looking for and respond. From our vantage point, the subpoena is fairly extensive and requests documents related to numerous entities to which KWA likely does not have any responsive documents. As counsel for Jeffrey Wright in this civil action, we have produced over 580,000 pages of documents in response to written discovery requests from the Plaintiffs, much, if not all of which would satisfy the subpoena you have issued. We do not want to duplicate these response and would like to work something out with you.

In executing that first production, we spent considerable time and resources, not only in this civil case, but with the initial productions related to other requests before this case began. The time and expense of essentially re-doing this production to potentially find, likely, little or nothing further, would be exorbitant and subject to Fed. R. Civ. P. 45(d)(2) fee shifting as KWA is a non-party to this case. We would like to discuss this with you and reach an agreement on this issue.

That said, pursuant to the terms of the subpoena (See ¶12 of the Definitions), to the extent we are required to comply with each and every request in this subpoena, it will not be possible through the exercise of reasonable diligence to comply fully within the 45-day timeframe. We would kindly request an enlargement of time for compliance with respect to this responding and would be happy to discuss a reasonable extension based upon our prior experience producing similar documents. Please let me know if, for some reason, you are unable to consider our request.

Finally, could you please provide a time in which you would be available to discuss this with myself and/or Mr. Meihn so that we can determine the most efficient and cooperative course of action moving forward? I am in all day tomorrow and we look forward to speaking with you, thanks.

-Matt

VERIFIED INTERNAL EMAIL  
FOLEY & MANSFIELD

**Matthew T. Wise**

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